

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC. and FIDELITY
20 NATIONAL TITLE INSURANCE COMPANY

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652
24 2950 E. Flamingo Road, Suite L
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 US BANK NATIONAL ASSOCIATION,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-CV-01454-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

SECOND REQUEST

Defendants Fidelity National Title Group, Inc. and Fidelity National Title Insurance Company (collectively, "Defendants") and plaintiff U.S. Bank National Association ("U.S. Bank"), by and through their respective attorneys of record, hereby agree and stipulate as follows:

1. On July 26, 2021, U.S. Bank filed its complaint in the Eighth Judicial District

1 Court for the State of Nevada;

2 2. On August 5, 2021, Defendants removed the instant case to the United States
3 District Court for the State of Nevada (ECF No. 1);

4 3. On August 12, 2021, the Court granted Defendants an extension of their deadline
5 to respond to the complaint, through and including September 17, 2021 (ECF No. 5);

6 4. Counsel for Defendants requests a further, 31-day extension, through and including
7 Monday, October 18, 2021, for Defendants to file their response to U.S. Bank's complaint to
8 afford Defendants' counsel additional time to review and respond to U.S. Bank's complaint.

9 5. Counsel for U.S. Bank does not oppose the requested extension;

10 6. This is the second request for an extension made by Defendants, which is made in
11 good faith and not for the purposes of delay.

12 7. This stipulation is entered into without waiving any of Defendants objections under
13 Fed. R. Civ. P. 12.

14 **IT IS SO STIPULATED** that Defendants' deadline to respond to the complaint is hereby
15 extended through and including Monday, October 18, 2021.

16 Dated: September 15, 2021

SINCLAIR BRAUN LLP

17 By: /s/-Kevin S. Sinclair

18 KEVIN S. SINCLAIR
19 Attorneys for Defendants
20 FIDELITY NATIONAL TITLE GROUP,
INC. and FIDELITY NATIONAL TITLE
INSURANCE COMPANY

21 Dated: September 15, 2021

WRIGHT FINLAY & ZAK, LLP

22 By: /s/-Lindsay D. Dragon

23 LINDSAY D. DRAGON
24 Attorneys for Plaintiff
U.S. BANK, NATIONAL ASSOCIATION

25 **IT IS SO ORDERED.**

26 Dated September 16, 2021

27 
28 NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE